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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

Arizona Corporation Commission

DOCKETED

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In the matter of)

FERENC ("Frank") J. CSAMPAI AND)
JANE DOE CSAMPAI, husband and wife,)
individually and doing business as)
GLOBAL AVIATION FUEL SYSTEMS)

and)

ROBERT N. NEKLEWICZ AKA ROBERT)
NEIL STOCK (CRD# 8984776) AND)
JANE DOE NEKLEWICZ, husband and)
wife, individually and doing business as)
GLOBAL AVIATION FUEL SYSTEMS)

Respondents.)

DOCKET NO. S-20569A-07-0702

DECISION NO. 70467

ORDER TO CEASE AND DESIST AND
ORDER FOR ADMINISTRATIVE
PENALTIES AND CONSENT TO SAME
BY: RESPONDENT ROBERT N.
NEKLEWICZ

Respondent ROBERT N. NEKLEWICZ ("NEKLEWICZ") elects to permanently waive any right to a hearing and appeal under Articles 11 and 12 of the Securities Act of Arizona, A.R.S. § 44-1801 *et seq.* ("Securities Act") with respect to this Order To Cease And Desist and Order For Administrative Penalties and Consent to Same ("Order"). Respondent admits the jurisdiction of the Arizona Corporation Commission ("Commission"); neither admits nor denies the Findings of Fact and Conclusions of Law contained in this Order; and consents to the entry of this Order by the Commission.

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I.**FINDINGS OF FACT**

1. ROBERT N. NEKLEWICZ is an individual residing in Las Vegas, Nevada, and doing business as GLOBAL AVIATION FUEL SYSTEMS ("GAFS").

2. NEKLEWICZ may be referred to collectively as "Respondent."

3. NEKLEWICZ was, at all relevant times, an unmarried man.

4. From, October of 2007 through December of 2007, NEKLEWICZ has been offered an investment opportunity to the general public by advertising on an internet website known as Craig's List/Phoenix ("Craig's List"). NEKLEWICZ represented that investors could earn up to 80% return on their investment with no risk. NEKLEWICZ also represented that the investments were guaranteed.

5. NEKLEWICZ sought a minimum investment in GAFS of \$10,000 with a maximum investment of \$100,000. According to the advertisement, NEKLEWICZ was looking for only four investors.

6. NEKLEWICZ represented to at least one Arizona offeree that GAFS researches the marketplace for quality Boeing 737 fuel pumps that are for sale for approximately \$5000. According to the NEKLEWICZ, he would instruct the investor to purchase the pump chosen by GAFS and have the pump shipped to GAFS.

7. According to the NEKLEWICZ, once delivered to GAFS, NEKLEWICZ will bench test and overhaul and/or repair the fuel pump. GAFS then will sell the pump to NEKLEWICZ's "contacts around the world."

8. NEKLEWICZ stated that when he received payment for the fuel pump, he would pay the investor \$5,000 plus a 20% profit for a total of \$6,000, "a 20% return on investment over a 120-day period."

9. NEKLEWICZ's stated goal was to have the investor repeat the process one or more times in a calendar year "to increase the return on investment."

10. NEKLEWICZ represented to an Arizona offeree that GAFS was seeking investors to build up the inventory of fuel pumps so GAFS would have spare fuel pumps to sell to entities that need immediate replacements.

11. NEKLEWICZ represented to the Arizona offeree that the investor would pay the manufacturer directly for the fuel pump. The manufacturer would send the fuel pump to GAFS for inventory. When an entity requests a fuel pump, GAFS will sell the investor's fuel pump and pay the investor the principal investment and a 20% return. According to NEKLEWICZ, the investor would receive the principal and return within about 90 days.

12. NEKLEWICZ would allow an investor to continue in the program for up to five years. Investors could cancel their investments and request refunds, which would be paid between 60 and at least 120 days.

13. Through the December 2007 advertisement on Craig's List, NEKLEWICZ represented that investors could earn up to an 80% return on their investments. Further, the advertisement stated "\$\$\$ Special Investment Available – Ground Floor before We Go Public \$\$\$" and "Attention Investors – Earn a High ROI that Beats Real Estate."

14. In written materials provided to at least one Arizona offeree, NEKLEWICZ represented a "No Risk 20-60% return on investment."

15. NEKLEWICZ is not licensed to offer or sell securities within or from Arizona.

16. NEKLEWICZ has made no sales to Arizona residents.

II.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over this matter pursuant to Article XV of the Arizona Constitution and the Securities Act.

2. NEKLEWICZ offered securities within or from Arizona, within the meaning of A.R.S. §§ 44-1801(15), 44-1801(21), and 44-1801(26).

3. NEKLEWICZ violated A.R.S. § 44-1841 by offering securities that were neither registered nor exempt from registration.

4. NEKLEWICZ violated A.R.S. § 44-1842 by offering securities while neither registered as dealers or salesmen nor exempt from registration.

5. NEKLEWICZ's conduct is grounds for a cease and desist order pursuant to A.R.S. § 44-2032.

6. NEKLEWICZ's conduct is grounds for administrative penalties under A.R.S. § 44-2036.

III.

ORDER

THEREFORE, on the basis of the Findings of Fact, Conclusions of Law, and NEKLEWICZ's consent to the entry of this Order, attached and incorporated by reference, the Commission finds that the following relief is appropriate, in the public interest, and necessary for the protection of investors:

IT IS ORDERED, pursuant to A.R.S. § 44-2032, that NEKLEWICZ, and any of NEKLEWICZ's agents, employees, successors and assigns, permanently cease and desist from violating the Securities Act.

IT IS FURTHER ORDERED that NEKLEWICZ comply with the attached Consent to Entry of Order.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2036, that NEKLEWICZ shall pay an administrative penalty in the amount of \$2,500.00. Payment shall be made to the “State of Arizona.” Payment shall be made in full on the date of this Order.

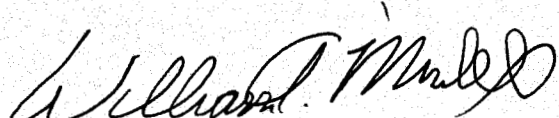
For purposes of this Order, a bankruptcy filing by the NEKLEWICZ shall be an act of default. If the NEKLEWICZ does not comply with this Order, any outstanding balance may be deemed in default and shall be immediately due and payable.

1 IT IS FURTHER ORDERED, that if the NEKLEWICZ fails to comply with this order, the
2 Commission may bring further legal proceedings against that NEKLEWICZ, including application
3 to the superior court for an order of contempt.

4 IT IS FURTHER ORDERED that this Order shall become effective immediately.

5 BY ORDER OF THE ARIZONA CORPORATION COMMISSION

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8 CHAIRMAN


COMMISSIONER

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COMMISSIONER


COMMISSIONER

COMMISSIONER

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12 IN WITNESS WHEREOF, I, BRIAN C. McNEIL,
13 Executive Director of the Arizona Corporation
14 Commission, have hereunto set my hand and caused the
15 official seal of the Commission to be affixed at the
16 Capitol, in the City of Phoenix, this 21st day of
17 August, 2008.

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19 BRIAN C. McNEIL
20 EXECUTIVE DIRECTOR

21
22 DISSENT

23
24 DISSENT

25 This document is available in alternative formats by contacting Linda Hogan, ADA Coordinator,
26 voice phone number 602-542-3931, e-mail lhogan@azcc.gov.

(wlc)

CONSENT TO ENTRY OF ORDER

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2 1. Respondent ROBERT N. NEKLEWICZ, an individual, admits the jurisdiction of
3 the Commission over the subject matter of this proceeding. Respondent ROBERT N.
4 NEKLEWICZ acknowledges that Respondent has been fully advised of Respondent's right to a
5 hearing to present evidence and call witnesses and Respondent ROBERT N. NEKLEWICZ
6 knowingly and voluntarily waives any and all rights to a hearing before the Commission and all
7 other rights otherwise available under Article 11 of the Securities Act and Title 14 of the Arizona
8 Administrative Code. Respondent ROBERT N. NEKLEWICZ acknowledges that this Order To
9 Cease And Desist and Order For Administrative Penalties and Consent to Same ("Order")
10 constitutes a valid final order of the Commission.

11 2. Respondent ROBERT N. NEKLEWICZ knowingly and voluntarily waives any
12 right under Article 12 of the Securities Act to judicial review by any court by way of suit, appeal,
13 or extraordinary relief resulting from the entry of this Order.

14 3. Respondent ROBERT N. NEKLEWICZ acknowledges and agrees that this Order is
15 entered into freely and voluntarily and that no promise was made or coercion used to induce such
16 entry.

17 4. Respondent ROBERT N. NEKLEWICZ, understands and acknowledges that he has
18 a right to seek counsel regarding this Order, and that he has had the opportunity to seek counsel
19 prior to signing this Order. Respondent ROBERT N. NEKLEWICZ acknowledges and agrees that,
20 despite the foregoing, he freely and voluntarily waives any and all right to consult or obtain
21 counsel prior to signing this Order.

22 5. Respondent ROBERT N. NEKLEWICZ neither admits nor denies the Findings of
23 Fact and Conclusions of Law contained in this Order. Respondent ROBERT N. NEKLEWICZ
24 agrees that he shall not contest the validity of the Findings of Fact and Conclusions of Law
25 contained in this Order in any present or future administrative proceeding before the Commission
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1 or any other state agency concerning the denial or issuance of any license or registration required
2 by the state to engage in the practice of any business or profession.

3 6. By consenting to the entry of this Order, Respondent ROBERT N. NEKLEWICZ
4 agrees not to take any action or to make, or permit to be made, any public statement denying,
5 directly or indirectly, any Finding of Fact or Conclusion of Law in this Order or creating the
6 impression that this Order is without factual basis. Respondent ROBERT N. NEKLEWICZ will
7 undertake steps necessary to assure that all of his agents and employees understand and comply
8 with this agreement.

9 7. While this Order settles this administrative matter between Respondent ROBERT
10 N. NEKLEWICZ and the Commission, Respondent ROBERT N. NEKLEWICZ understands that
11 this Order does not preclude the Commission from instituting other administrative or civil
12 proceedings based on violations that are not addressed by this Order.

13 8. Respondent ROBERT N. NEKLEWICZ understands that this Order does not
14 preclude the Commission from referring this matter to any governmental agency for
15 administrative, civil, or criminal proceedings that may be related to the matters addressed by this
16 Order.

17 9. Respondent ROBERT N. NEKLEWICZ understands that this Order does not
18 preclude any other agency or officer of the state of Arizona or its subdivisions from instituting
19 administrative, civil, or criminal proceedings that may be related to matters addressed by this
20 Order.

21 10. Respondent ROBERT N. NEKLEWICZ agrees that he will not apply to the state of
22 Arizona for registration as a securities dealer or salesman or for licensure as an investment adviser
23 or investment adviser representative until such time as all penalties under this Order are paid in
24 full.

1 11. Respondent ROBERT N. NEKLEWICZ agrees that he will not exercise any control
2 over any entity that offers or sells securities or provides investment advisory services within or
3 from Arizona until such time as all penalties under this Order are paid in full.

4 12. Respondent ROBERT N. NEKLEWICZ agrees that he will not sell any securities in
5 or from Arizona without being properly registered in Arizona as a dealer or salesman, or exempt
6 from such registration; he will not sell any securities in or from Arizona unless the securities are
7 registered in Arizona or exempt from registration; and he will not transact business in Arizona as
8 an investment adviser or an investment adviser representative unless properly licensed in Arizona
9 or exempt from licensure.

10 13. Respondent ROBERT N. NEKLEWICZ consents to the entry of this Order and
11 agrees to be fully bound by its terms and conditions.

12 14. Respondent ROBERT N. NEKLEWICZ acknowledges and understands that if he
13 fails to comply with the provisions of the order and this consent, the Commission may bring
14 further legal proceedings against Respondent, including application to the superior court for an
15 order of contempt.

16 15. Respondent ROBERT N. NEKLEWICZ understands that default shall render him
17 liable to the Commission for its costs of collection and interest at the maximum legal rate.

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16. Respondent ROBERT N. NEKLEWICZ agrees and understands that if he fails to make any payment as required in the Order, any outstanding balance shall be in default and shall be immediately due and payable without notice or demand. Respondent ROBERT N. NEKLEWICZ agrees and understands that acceptance of any partial or late payment by the Commission is not a waiver of default by Commission.

Robert N. Neklewicz
 ROBERT N. NEKLEWICZ

STATE OF ARIZONA)
) ss
 County of)

SUBSCRIBED AND SWORN TO BEFORE me this 15th day of JULY, 2008.

Gary R. Clapper
 NOTARY PUBLIC

My commission expires:

